



**Robert W. Quinn, Jr.**  
Federal Government Affairs  
Vice President

Suite 1000  
1120 20th Street NW  
Washington DC 20036  
202 457 3851  
FAX 202 457 2545

November 21, 2001

Via Electronic Filing  
Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TWB-204  
Washington, DC 20554

Re: Notice of Ex Parte Presentation:  
CC Docket No. 96-128, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

On Tuesday, November 20, 2001, Mary Brown from WorldCom and I had a telephone conversation with Matthew Brill, Legal Advisor to Commissioner Kathleen Q. Abernathy to discuss issues associated with the above captioned item. We explained that a completion factor could be used as a proxy to determine compensable calls routed to switch-based resellers. We explained that both interexchange carriers and switch-based resellers had submitted call completion data by users of their pre-paid card products, and that the Commission had sufficient record evidence to determine a reliable call completion factor. We explained that underlying carriers would be able to manage their new payphone compensation obligations efficiently provided the Commission established a single call completion factor. We stressed that the administrative efficiencies would not materialize if underlying carriers were required to negotiate individual call completion factors to use for each reseller, and that it was imperative for the Commission to determine a reasonable call completion factor. While our original plan proposed delaying the application of a call completion factor until January 1, 2002, we proposed that underlying carriers would be willing to apply a call completion factor beginning November 23, 2001. This approach would require compensating payphone service providers for all calls sent to switch based resellers and surcharging resellers on this basis between November 23, 2001 and December 31, 2001. Carriers would subsequently credit resellers and debit payphone service providers according to the call completion factor set by the Commission, once that became known. Finally, we explained that giving resellers the discretion to compensate payphone service providers directly with the aid of a clearinghouse would be administratively infeasible unless the Commission were to apply this compensation approach to all resellers.

I have submitted one copy of this Notice in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Quinn, Jr." with a stylized flourish at the end.

Robert W. Quinn, Jr.

cc: M. Brill